



Clean Air Act Compliance Inspection Report

United States Environmental Protection Agency
Region 10 – Seattle, WA

Clean Air Act Full Compliance Evaluation Inspection Report

Powell's Body Shop and Towing
Blackfoot, ID 83221

Inspection Date: July 18, 2022

Report Author Signature

Date

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Attachments

Attachment 1.....	Idaho Air Quality Compliance Inspection, Preliminary Inspection Findings
Attachment 2.....	Product Purchase Records
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1. Basic Facility and Inspection Information

Facility: Powell's Body Shop and Towing
496 W. Hwy 39
Blackfoot, Idaho, 83221

AFS/FRS Number: Not available

State Facility ID: 011-00042

SIC: 7532 Top, Body, and Upholstery Repair Shops and Paint Shops

NAICS: 811121 Automotive Body, Paint, Interior Repair and Maintenance

Permit Number: Idaho Permit to Construct No. P-2011.0035, dated February 10, 2011

Facility Contacts: Dustin Powell
Owner
Powell's Body Shop and Towing
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Inspectors: Bryan Lange
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Date of Inspection: July 18, 2022

Inspection Start/End Times: July 18, 2022, 9:50 am – 11:10 am MST

Inspection Notice: This was an announced inspection.

Mr. Lange notified Mr. Powell, by phone on July 14, 2022.

This was a Clean Air Act (CAA) compliance inspection by an Environmental Protection Agency (EPA) Contractor. Inspector Mr. Lange, with Eastern Research Group, led the inspection. The state air agency was made aware of the inspection beforehand and participated in the inspection. The purpose was to identify potential compliance concerns with CAA regulations, specifically to gather information to determine if the facility is in compliance with the Permit to Construct (PTC) and the National Emission Standards for Hazardous Air Pollutants (NESHAP) subpart HHHHHH (Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources).

Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection. The information provided does not constitute a final decision on compliance with CAA regulations or applicable permits, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

1. Facility/Process Description:

The following facility description is based on information provided by a facility representative in the opening conference as well as information found on-file regarding permits and prior inspections.

Powell's Body Shop and Towing is a refinishing operation that repairs and paints automobiles. It has two paint booths. The emission sources located at the facility included the following:

- Mixing room,
- Spray booths,
- Spray guns,
- Spray gun cleaning equipment,
- Paint storage area, and
- Spray booth heater.

2. Compliance History

On June 5, 2018, Idaho Department of Environmental Quality (DEQ) conducted an on-site inspection and the facility was found in compliance at the time of the inspection.

Powell's Body Shop and Towing is not registered in EPA's ECHO as of the date of this report.¹

3. Records Review Prior To The Inspection

Prior to inspection, Idaho DEQ shared copies of these items and each was reviewed:

- March 16, 2011 - PTC No. P-2011.0089 and statement of basis.
- June 5, 2018 - Idaho inspection report documenting an on-site inspection.

¹ See <https://echo.epa.gov/>

a. Entry and Opening Conference

Mr. Lange and Mr. Aytes (“the inspectors”) arrived at the facility at approximately 9:50 am MST on July 18, 2022. They entered Mr. Powell’s office. The inspectors presented identification cards and explained that they were at the facility to conduct a CAA inspection. The opening conference included a discussion of operations.

The inspectors explained that the inspection would consist of a review of the PTC conditions followed by a walk-through where records will be reviewed.

The inspectors also explained that following the walk-through, Idaho DEQ will leave the facility with a carbon copy of an Air Quality Compliance Inspection - Preliminary Inspection Findings Form (PIFF) documenting the inspection details and Mr. Aytes will keep the original.

Mr. Powell described the two paint booths, one is a crossflow booth that was built by the original owner (i.e., Burdette Body Shop); it is large enough to fit a truck. The second booth is semi-down draft, and it is used more frequently.

4. Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (NESHAP Subpart 6H)

Mr. Powell indicated that the coating materials used on-site do not contain the Subpart HHHHHH target HAP (i.e., compounds of chromium, lead, manganese, nickel, or cadmium) and rule does not apply. Nonetheless, Powell's Body Shop and Towing follows the general compliance requirements of the NESHAP.

Specifically, Mr. Powell was explained that all painters were trained in the proper application of surface coatings. Powell's Body Shop and Towing uses the BASF R-M single stage paint products. Annually, the vendor provides new high volume-low pressure (HVLP) paint guns and pant application training.

5. Permit to Construct Conditions

To determine if the facility is in compliance with the VOC and PM₁₀ emission limits included in the PTC the inspectors reviewed paint consumption records and discussed spray booth filter system maintenance procedures.

Compliance with VOC emission limits are demonstrated with the coating material use limit. Coating material use records are an area of concern. The available records were purchase reminders or a shopping list. The two most recent notebook recent entries were logged on June 14 and June 20, 2022, and contained 10 and 11 items respectively (e.g., 3 gallons of DC 5335). DC 5335 is a “Glamour Clear” clearcoat available from BASF. See Photographs 1 and 2 in attached photo log.

Mr. Powell explained the paint booth floor exhaust filter replacement procedures. The glass fiber exhaust filters are replaced every 3-weeks. The filter media comes from the manufacturing of a roll, and it is cut to size. Mr. Powell explained that consistent flow is necessary for a quality finish on the automobiles. The inspectors affirmed that 98 percent control efficiency is

achievable. These glass fiber filters are identical to the type used at other autobody shops where manufacture guarantees were available.

6. Facility Walk-Through and On-Site Records Review

At approximately 10:40 am MST, the inspectors were escorted to the automobile paint and repair area.

The inspectors observed that each paint gun used for the applications of coatings were HVLP.

Mr. Powell indicated that each paint booth contained a natural gas fired heater and the total heat input capacity all space heaters was less than 10 MMBtu/hr.

The walk-through ended at approximately 10:50 am MST.

7. Closing Conference

At approximately 10:55 am MST, the inspectors held a closing conference. Mr. Lange led the closing conference and summarized the exemption permit conditions and records observed by the inspectors. Mr. Lange went through his inspection notes and described an area of concern from the inspection.

1. Calculating a daily coating volume was difficult with the available records. It was recommended that changes be made such that compliance with the daily volumes operational requirements can be demonstrated and are actively managed.

Mr. Aytes explained that Powell's Body Shop and Towing has an option to submit a NESHAP Subpart 6H petition for exemption to EPA. Once this petition has been accepted by EPA then the related compliance activities (e.g., training required under the NEHAP) will no longer be required.

Mr. Aytes presented Mr. Hall with carbon copy of an Idaho DEQ Air Quality Compliance Inspection PIFF documenting inspection details and preliminary status of in-compliance at the time of the inspection.

The inspectors departed the facility at 11:10 am MST.

Following the inspection activities, on July 19, 2020, Mr. Powell was asked to provide documentation of training records and product purchase records. Mr. Powell provided four months of purchase records. Daily usage figures were approximated by assuming that surface coating took place every workday. This evidence shows that when reasonable assumptions are made, the use rates are below the 4.0 gallons per day operational requirement.

Powell's Body Shop and Towing, Blackfoot, ID

Month	Jan 2022	Feb 2022	Mar 2022	Apr 2022
Total Coating Ordered (Gallons)	62.9	63.9	68.4	57.8
Workdays in Month	21	20	23	21
Average Use/Daily	3.0	3.2	3.0	2.8